

REMARKS

Claims 2, 4, 6, 8, 12-17 and 19-65 were previously pending in the present application. Claims 57-65 are currently canceled without prejudice or disclaimer in response to the Examiner's constructive non-election thereof. Claims 22, 26 and 27 are also currently canceled without prejudice or disclaimer, and new claims 66-69 are currently added. Consequently, claims 2, 4, 6, 8, 12-17, 19-21, 23-25, 28-56 and 66-69 are currently pending in the present application.

Reconsideration of the present application in light of the above amendments and the following remarks is respectfully requested.

Claim objections

The Examiner has objected to claims 4, 34-37 and 46 for containing various informalities. However, it is believed that the present amendments to these claims overcome the Examiner's objections. Accordingly, Applicants respectfully request the Examiner withdraw the objections.

The Examiner has also objected to claims 2 and 42-44 because, in each claim, the preamble states that the claim is a wellbore casing although a casing is allegedly not mentioned anywhere in the body. However, claim 2 clearly recites "wherein the thin wall section is adapted to radially expand and plastically deform from intimate contact with a thin wall section of a second tubular member upon radial expansion and plastic deformation of the second tubular member to form a mono-diameter wellbore casing." Claims 42-44 include similar passages. Thus, the preamble and body of each of claims 2 and 42-44 appropriately correspond. Accordingly, Applicants respectfully request the Examiner withdraw the objections to claims 2 and 42-44.

Rejections under 35 U.S.C. §102**Claim 4**

Claim 4 was rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,337,823 to Nobileau ("Nobileau"). The PTO provides in MPEP §2131 that, to anticipate a claim, a reference must teach every element of the claim. Therefore, to sustain this rejection with respect to claim 4, Nobileau must contain all of the elements of claim 4.

However, Nobileau does not disclose that, prior to deformation, the inside diameter of the flexible casing is substantially constant. In contrast, the flexible casing taught in Nobileau is folded into a horseshoe shape 17 or a flat shape 15. (Col. 9, lines 1-3). Neither shape comprises an inside diameter, but instead includes a non-circular inside profile that is flat or horseshoe-shaped. Moreover, due to the explicitly flexible nature of the casing, the non-circular inside profile of the flexible casing cannot be constant.

Consequently, the §102 rejection of claim 4 is not supported by Nobileau. Accordingly, Applicants respectfully request the Examiner withdraw the rejection.

Claim 12

Claim 12 was also rejected under 35 U.S.C. §102(b) as being anticipated by Nobileau. The PTO provides in MPEP §2131 that, to anticipate a claim, a reference must teach every element of the claim. Therefore, to sustain this rejection with respect to claim 12, Nobileau must contain all of the elements of claim 12.

However, Nobileau does not disclose that the first and second wellbore casing members each substantially comprise steel, as recited in claim 12. In contrast, the flexible casing taught in Nobileau comprises a polymerized composite in which reinforcing fibers are held in place within a polymerizable or thermosetting resin. (Col. 8, lines 6-68). Although the reinforcing fibers may be metallic, the fibers are nonetheless "rigidized" by the curing of the resin, which is not steel. Thus, the flexible casing does not substantially comprise steel.

Consequently, the §102 rejection of claim 12 is not supported by Nobileau. Accordingly, Applicants respectfully request the Examiner withdraw the rejection.

Rejections Under 35 U.S.C. §103**Claim 6**

The Examiner has also rejected claim 6 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 4,501,330 to Garcia ("Garcia") in view of U.S. Patent No. 3,193,005 to Hunter, et al. ("Hunter"). However, the Examiner has also indicated that claim 22, which previously depended from claim 6, would be allowable if rewritten in independent form. Accordingly, claim 6 is currently amended to incorporate the subject matter of previously-pending claim 22. Consequently, claim 6 is believed to be patentable over the combination of Garcia and Hunter. Therefore, Applicants respectfully request the Examiner withdraw the rejection.

New Claims

New claims 66-69 each depend from claim 4, which is currently rejected under 35 U.S.C. §102(b) as anticipated by Nobileau. As described above, claim 4 is believed to be patentable over Nobileau. Thus, new claims 66-69 are also believed to be patentable over Nobileau because they depend from claim 4.

Moreover, claims 66-69 are also believed to be patentable over Nobileau because Nobileau does not disclose that:

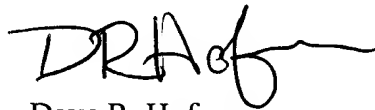
- the first and second tubular casing members each substantially comprise steel;
- the first and second tubular casing members each substantially comprise Oilfield Country Tubular Goods (OCTG);
- prior to the deformation, the first and second tubular casing members are each substantially rigid; or
- prior to the deformation, the first and second tubular casing members have substantially circular cross sections.

Conclusion

All matters set forth in the Office Action have been addressed. Accordingly, it is believed that all claims are in condition for allowance. Favorable consideration and an early indication of allowability are respectfully requested.

Should the Examiner deem that an interview with Applicants' undersigned attorney would expedite consideration, the Examiner is invited to call the undersigned attorney at the telephone number indicated below.

Respectfully submitted,



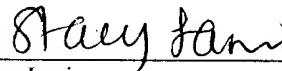
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